

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

**CECILIA IRIS ISRAEL,**

**Plaintiff,**

**v.**

**VERNON WOODS ANIMAL HOSPITAL,  
P.C.,**

**Defendant.**

**No.**

**PLAINTIFF REQUESTS JURY TRIAL**

**COMPLAINT FOR DAMAGES**

Plaintiff, Cecilia Iris Israel, through her undersigned counsel, for her Complaint for Damages against Defendant, Vernon Woods Animal Hospital, P.C. (“Vernon”), states as follows:

**NATURE OF THE ACTION**

1. Plaintiff brings this action against Defendant, Vernon, pursuant to Title VII of the Civil Rights Act of 1964 and 1991, 42 U.S.C. §2000e, et seq., and the Age Discrimination in Employment Act of 1967, 29 U.S.C. §623, et seq., to recover damages, including, but not limited to, back pay, front pay, compensatory and punitive damages, plus attorneys’ fees and costs, arising out of Defendant’s discrimination against Plaintiff based on her age and disability.

**THE PARTIES**

2. Plaintiff is an individual who is domiciled in, and a citizen of, Georgia.
3. Defendant is a Georgia professional corporation with its principal place of business in Atlanta, Georgia.

### **JURISDICTION AND VENUE**

4. This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C. §1331 and 42 U.S.C. 2000e-5(1)(3) because it involves a federal question.

5. Venue is proper in this district pursuant to 28 U.S.C §1391(b)(2) because this is the district in which a substantial part of the events or omissions giving rise to Plaintiff's claims occurred.

### **BACKGROUND**

6. Plaintiff is a 73 year-old woman who needs to wear hearing aids due to hereditary and age-related hearing loss.

7. Defendant, Vernon, is a professional corporation that operates an animal hospital at 270 Vernon Woods Drive NE, Atlanta, Georgia.

8. Plaintiff was employed by Vernon as a receptionist.

9. At all relevant times, Vernon knew Plaintiff's age and that she was disabled as described in Paragraph 6.

10. On or around July 28, 2022, Vernon's Hospital Administrator, Cindy Martin, fired Plaintiff. When Plaintiff asked Martin why she was being fired, Martin replied, "It's your hearing."

11. Vernon never offered, nor provided Plaintiff an opportunity to request, a reasonable accommodation.

12. Plaintiff exhausted her administrative remedies by filing a Charge with the EEOC. The EEOC issued Plaintiff a right to sue letter within 90 days of the filing of this action.

**COUNT I-VIOLATION OF THE CIVIL RIGHTS ACT, 42 U.S.C. §2000e**

13. Plaintiff repeats and realleges paragraphs 1-12 as though fully set forth herein.

14. Defendant discriminated against Plaintiff because it knew Plaintiff was “elderly” and that she suffered from hereditary and age-related hearing loss.

15. Plaintiff was damaged in that her rights were violated and she suffered mental anguish and emotional distress, physical injuries, medical bills, lost wages and benefits and loss of enjoyment of life.

16. Defendant intentionally discriminated against Plaintiff in violation of the Civil Rights Act of 1964 and 1991, entitling Plaintiff to compensatory and punitive damages against Vernon.

WHEREFORE, Plaintiff, Cecilia Iris Israel, respectfully prays that this Court enter judgment in her favor and against defendant, Vernon Woods Animal Hospital, P.C., in the amount of at least \$300,000, plus interest and attorneys’ fees and costs.

**COUNT II-VIOLATION OF THE AMERICANS WITH  
DISABILITIES ACT, 42 USC §12101, et seq.**

17. Plaintiff repeats and realleges paragraphs 1-16 as though fully set forth herein.

18. Plaintiff was damaged in that her rights were violated and she suffered mental anguish and emotional distress, physical injuries, medical bills, lost wages and benefits and loss of enjoyment of life.

19. Defendant intentionally discriminated against Plaintiff in violation of the Americans with Disabilities Act of 1990, entitling Plaintiff to compensatory and punitive damages against Vernon.

WHEREFORE, Plaintiff, Cecilia Iris Israel, respectfully prays that this Court enter judgment in her favor and against defendant, Vernon Woods Animal Hospital, P.C., in the amount of at least \$300,000, plus interest and attorneys' fees and costs.

Respectfully Submitted,

CECILIA IRIS ISRAEL,

By: /s/ Kevin J. Kuhn  
Her Attorney

Kevin J. Kuhn  
KUHN FIRM P.C.  
2 E. Bryan St., Suite 420  
Savannah, GA 31401  
kkuhn@kuhnfirm.com  
912-574-4373  
*Attorney for Plaintiff*